

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHRISTINE RADOGNO, in her official capacity )  
as Minority Leader of the Illinois Senate, )  
THOMAS CROSS, in his official capacity as )  
Minority Leader of the Illinois House of )  
Representatives, ADAM BROWN, in his official )  
capacity as a state representative from the 101<sup>st</sup> )  
Representative District and individually as a )  
registered voter, VERONICA VERA, CHLOE )  
MOORE, JOE TREVINO, and ANGEL )  
GARCIA, )

Plaintiffs, )

vs )

ILLINOIS STATE BOARD OF ELECTIONS, )  
RUPERT BORGS MILLER, Executive Director of )  
the Illinois State Board of Elections, HAROLD D. )  
BYERS, BRYAN A. SCHNEIDER, BETTY J. )  
COFFRIN, ERNEST C. GOWEN, WILLIAM F. )  
McGUFFAGE, JUDITH C. RICE, CHARLES W. )  
SCHOLZ, and JESSE R. SMART, all named in )  
their official capacities as members of the Illinois )  
State Board of Elections, )

Defendants. )

NO. 1:11-cv-04884

Judge Elaine E. Bucklo

Magistrate Geraldine Soat Brown

**MOTION FOR APPOINTMENT OF THREE-JUDGE COURT**

NOW COME the Plaintiffs, CHRISTINE RADOGNO, THOMAS CROSS, ADAM BROWN, VERONICA VERA, CHLOE MOORE, JOE TREVINO and ANGEL GARCIA, by and through their attorneys, and, pursuant to 28 U.S.C. § 2284, respectfully move this Court to appoint a three-judge court to adjudicate this matter. In support hereof, Plaintiffs state the following:

1. The appointment of a three-judge court is required to adjudicate redistricting cases. Section 2284(a) provides:

A district court of three judges shall be convened when otherwise required by Act of Congress, or when an action is filed challenging the constitutionality of the apportionment of congressional districts or the apportionment of any statewide legislative body.

2. Plaintiffs have filed an action challenging the constitutionality of the current apportionment of the Illinois General Assembly. The Illinois General Assembly is a "statewide legislative body." The Complaint challenges the current redistricting plan for the Illinois General Assembly because it plainly violates *inter alia* the Voting Rights Act of 1965, the First Amendment to the U.S. Constitution, the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution and the Illinois Constitution. Thus, the case presents substantial constitutional claims regarding Illinois' apportionment of its legislative districts.

WHEREFORE, Plaintiffs respectfully request that a three-judge panel be convened for the above-captioned case.

Respectfully submitted,

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One of the Attorneys for Plaintiffs Christine  
Radogno and Veronica Vera

/s/-----Thomas M. Leinenweber-----  
One of the Attorneys for Plaintiffs Thomas Cross,  
Adam Brown, Chloe Moore, Joe Trevino, Angel  
Garcia

/s/-----Andrew Sperry-----  
One of the Attorneys for Plaintiffs Thomas Cross,  
Adam Brown, Chloe Moore, Joe Trevino, Angel  
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